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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

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## **IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION**

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**THIS DOCUMENT RELATES TO:**

*Epic Games, Inc. v. Google LLC et al.,*  
Case No. 3:20-cv-05671-JD

*Match Group, LLC, et al., v. Google LLC et al.,*  
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**STIPULATION AND [PROPOSED]  
ORDER RE DEPOSITION AND  
DISCOVERY DESIGNATIONS**

Judge: Hon. James Donato

1 Defendants Google LLC et al., (“Google”), Plaintiff Epic Games, Inc. (“Epic”), and Plaintiff  
2 Match Group, LLC, et al. (“Match Group”) (collectively, “the Parties”), by and through their  
3 undersigned counsel of record and subject to the Court’s approval, enter into this stipulation with  
4 reference to the following circumstances:

5 WHEREAS, pursuant to Paragraph 32 of the Court’s Standing Order for Civil Jury Trials, the  
6 Parties are to jointly file all excerpts of affirmative and counter-designations of deposition testimony  
7 and other discovery responses that will be offered by any party at trial for any reason other than  
8 impeachment or rebuttal on November 1, 2023 (“Deposition and Discovery Designations”);

9 WHEREAS, in the interests of efficiency and minimizing burden on the Court, parties, and  
10 non-parties, the parties have conferred and agreed to electronically lodge with the Court (rather than  
11 file) all Deposition and Discovery Designations;

12 WHEREAS, the Parties have conferred and agreed that once Deposition and Discovery  
13 Designations are used in front of the jury during trial, those designations will be submitted into the trial  
14 record and filed on the docket pursuant to the Civil Local Rules or as otherwise ordered by the Court;

15 WHEREAS, the Parties have further conferred and agreed to a modified deposition designation  
16 exchange schedule for the deposition of non-party Riot Games, Inc. (“Riot”), which was conducted on  
17 October 27, 2023, to permit sufficient time for the parties to exchange their designations and any  
18 objections prior to their submission to the Court;

19 **NOW, THEREFORE, IT IS STIPULATED AND AGREED, SUBJECT TO THE  
20 APPROVAL OF THE COURT:**

21 1. The Parties will electronically lodge Deposition and Discovery Designations with the  
22 Court on November 1, 2023.

23 2. Once Deposition and Discovery Designations are used in front of the jury during trial,  
24 those designations will be submitted into the trial record and filed on the docket pursuant to the Civil  
25 Local Rules or as otherwise ordered by the Court.

26 3. The Parties agree to the following deposition designation exchange schedule for the  
27 Riot deposition:

28 a. The Parties agree to exchange initial deposition designations for the Riot

- 1 deposition on November 1, 2023;
- 2 b. The Parties agree to exchange counter designations and objections to initial  
3 designations for the Riot deposition on November 3, 2023; and  
4 c. The Parties agree to lodge their affirmative and counter-designations and any  
5 objections to the Riot deposition with the Court on November 6, 2023.
- 6

7 Dated: October 30, 2023

MORGAN, LEWIS & BOCKIUS LLP

8 By: /s/ Michelle Park Chiu  
Michelle Park Chiu

9 *Counsel for Google*

10 Dated: October 30, 2023

HUESTON HENNIGAN LLP

11 By: /s/ Douglas J. Dixon  
12 Douglas J. Dixon

13 *Plaintiffs Match Group, LLC, Humor Rainbow, Inc.,  
PlentyofFish Media ULC, and People Media, Inc.*

14 Dated: October 30, 2023

CRAVATH, SWAINE & MOORE LLP

15 By: /s/ Gary A. Bornstein  
16 Gary A. Bornstein

17 *Counsel for Plaintiff Epic Games, Inc.*

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20 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

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Dated: \_\_\_\_\_

23 Honorable James Donato  
United States District Judge  
24 Northern District of California

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## **E-FILING ATTESTATION**

I, Michelle Park Chiu, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(h)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Michelle Park Chiu  
Michelle Park Chiu